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June 17, 1994
NRC-94-0043

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

- References:
- 1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43
 - 2) NRC Inspection Report 50-341/89-018,
dated August 14, 1989
 - 3) NRC Inspection Report 50-341/89-021,
dated September 28, 1989
 - 4) Fermi 2 Licensee Event Report (LER) 92-010,
dated October 19, 1992
 - 5) NRC Inspection Report 50-341/92-021,
dated January 22, 1993

Subject: Voluntary Reporting of Valid Initiations of the
Non-Interruptible Air System

The purpose of this letter is to withdraw a commitment made in regard to the voluntary reporting of valid initiations of the Non-Interruptible Air System (NIAS). Reference 2 described a July 9, 1989 event in which both NIAS compressors automatically started on low air header pressure. The NRC inspector concluded that neither the Updated Safety Analysis Report (UFSAR) nor the Safety Evaluation Report (SER) identified NIAS as an ESF system; and therefore, reporting under 10CFR50.72 and/or 10CFR50.73 was not required. The inspector however, requested that Detroit Edison review the situation under the voluntary reporting aspects of the Licensee Event Report (LER) system. The report also indicated that the NRC would explore the need to reclassify the NIAS as an ESF system through appropriate internal regulatory avenues.

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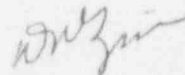
On August 31, 1989 the inspector met with Fermi plant personnel, including the Plant Manager, and a verbal commitment was made to voluntarily report all valid automatic initiations of the NIAS compressors (Reference 3). On September 18, 1992 the NIAS automatically initiated again and a voluntary LER was submitted (Reference 4) in accordance with the above stated agreement. NRC's review of this LER is discussed in Reference 5.

Review and discussion with NRC has not resulted in any change to the regulatory basis as it pertains to the NIAS. Specifically, NIAS is not considered an ESF system; and therefore, initiations of this system do not require reporting in accordance with 10CFR50.72 or 10CFR50.73. Additionally, because of the plant specific nature of this system, it is not likely that continued reporting through voluntary LERs is of generic value to the industry. Continued reporting of valid NIAS initiations also places a regulatory burden on Detroit Edison which is not warranted.

Therefore, based upon these further reviews and discussion with NRC, Detroit Edison is hereby withdrawing the commitment described in Reference 3 to report automatic initiations of the NIAS compressors through voluntary LERs.

Please feel free to contact J. E. Conen, Acting Lead Compliance Engineer, at (313) 586-1960 if you need any further information.

Sincerely,



cc: T. G. Colburn
J. B. Martin
M. P. Phillips
K. R. Riemer
Region III